

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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**ContentGuard Holdings, Inc.,**

*Plaintiff,*

**vs.**

**Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research in Motion Limited) and BlackBerry Corporation (fka Research in Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC,**

*Defendants,*

**and**

**DirecTV, LLC,**

*Intervenor.*

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**No. 2:13-cv-01112-JRG**

**APPLE INC.’S NOTICE OF FILING OF PETITIONS FOR  
PATENT OFFICE REVIEW OF ASSERTED PATENTS**

Plaintiff ContentGuard Holdings, Inc. (“ContentGuard”) asserts nine patents against Apple Inc. (“Apple”) in this case: U.S. Patent Nos. 6,963,859; 7,225,160; 7,269,576; 7,523,072; 8,370,956; and 8,393,007 (the Stefik patents); U.S. Patent Nos. 7,774,280 and 8,001,053 (the Nguyen patents); and U.S. Patent No. 8,583,556 (the Dunkeld patent).

Apple hereby notifies the Court that it has filed petitions for patent office review of each asserted patent. As listed below, the petitions include petitions for *Inter Partes Review* (“IPR”) and petitions for review of a Covered Business Method patent (“CBM”). According to the usual

patent office timeline for such proceedings, ContentGuard will have approximately three months to file a preliminary response to Apple's petitions, and the patent office will decide whether to institute review within approximately three months thereafter.

Group	Patent No.	Filing No.	Filing Date
<b>Nguyen</b>			
	7774280	IPR2015-00351	12/10/2014
	7774280	IPR2015-00352	12/10/2014
	7774280	IPR2015-00353	12/10/2014
	7774280	IPR2015-00354	12/10/2014
	8001053	IPR2015-00355	12/10/2014
	8001053	IPR2015-00356	12/10/2014
	8001053	IPR2015-00357	12/10/2014
	8001053	IPR2015-00358	12/10/2014
<b>Dunkeld</b>			
	8583556	CBM2015-00041	12/12/2014
	8583556	CBM2015-00042	12/12/2014
	8583556	CBM2015-00046	12/12/2014
	8583556	IPR2015-00399	12/12/2014
	8583556	IPR2015-00400	12/12/2014
<b>Stefik</b>			
	6963859	IPR2015-00440	12/22/2014
	6963859	IPR2015-00441	12/22/2014
	6963859	IPR2015-00442	12/22/2014
	7523072	IPR2015-00443	12/22/2014
	7523072	IPR2015-00444	12/22/2014
	7523072	IPR2015-00445	12/22/2014
	8370956	IPR2015-00446	12/22/2014
	8370956	IPR2015-00447	12/22/2014
	8370956	IPR2015-00448	12/22/2014
	8393007	IPR2015-00449	12/22/2014
	8393007	IPR2015-00450	12/22/2014
	8393007	IPR2015-00451	12/22/2014
	7269576	IPR2015-00452	12/22/2014
	7269576	IPR2015-00453	12/22/2014
	7269576	IPR2015-00454	12/22/2014
	7269576	IPR2015-00455	12/22/2014
	7269576	IPR2015-00456	12/22/2014
	7225160	IPR2015-00457	12/22/2014
	7225160	IPR2015-00458	12/22/2014

Apple also notifies the Court that Google Inc. has filed three petitions for review of Covered Business Method patents: CBM2015-00040 (filed 12/9/2014 for U.S. Patent No.

7,774,280); CBM2015-00043 (filed 12/11/2014 for U.S. Patent No. 8,001,053); and CBM2015-00045 (filed 12/12/2014 for U.S. Patent No. 8,583,556).

Dated: January 7, 2015

Respectfully submitted,

/s/ Melissa R. Smith

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**ATTORNEYS FOR APPLE, INC.**

## CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on January 7, 2014. *See* Local Rule CV-5(a)(3)(A).

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/s/ *Melissa Smith*  
 Melissa R. Smith